

13012863

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

Mall Processing Section FER 2.8 2013 Washington DC

400

SEC

ANNUAL AUDITED REPORT FORM X-17A-5 PART III OMB APPROVAL

OMB Number 3235-0123

Expires: March 1, 2014 Estimated average burden hours per response . . . 12.00

SEC FILE NUMBER

8-67059

FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING

JANUARY 1, 2012

__AND ENDING_

DECEMBER 31, 2012

MM/DD/VV

A. REGISTRANT IDENTIFICATION

NAME OF BROKER-DEALER: PTP Securities, LLC

OFFICIAL USE ONLY

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

FIRM ID. NO. 136832

540 HOPMEADOW STREET, SUITE 5

(No. and Street)

SIMSBURY

(CITY)

CT

06070 (zip Code)

(state)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

ATTILIO A. ALBANI, CEO

1-860-264-1595

(Area Code - Telephone No.)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report*

Karll, Harvey CPA, P.C.

41 Middle Street (Address)

Newburyport

MA (State) 01950-2755

(ZIP Code)

CHECK ONE:

XX Certified Public Accountant

Public Accountant

Accountant not resident in United States or any of its possessions.

FOR OFFICIAL USE ONLY

*Claims -for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See section 240.17a-5(e)(2).

SEC 1410 (06-02)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.



OATH OR AFFIRMATION

I, <u>Attilio A. Albani</u> swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statements and supporting schedules pertaining to the firm of <u>PTP Securities, LLC</u>, as of <u>December 31, 2012</u> are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:

PATRICIA FANTI

Notary Public, State of Connecticut

My Commission Expires May 31, 2016

1

Title

This report** contains (check all applicable boxes):

Notary Public

- X (a) Facing page.
- X (b) Statement of Financial Condition.
- X (c) Statement of Income (Loss).
- X (d) Statement of Changes in Financial Condition.
- X (e) Statement of Changes in Stockholders' Equity, or Partners' or Sole Proprietor's Capital.
 - (f) Statement of Changes in Liabilities Subordinated to Claims, of Creditors.
- X (g) Computation of Net Capital
 - (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- X (i) Information Relating to the Possession or control Requirements under Rule 15c3-3.
 - (j) A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- X (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation
- X (l) An Oath or Affirmation
- X (m)A copy of the SIPC Supplemental Report.
- X (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

^{**}For conditions of confidential treatment of certain portions, of this filing, see section 240.17d-5 (e)(3).



Harvey E. Karll CPA, PC.

41 Middle Street Newburyport, Massachusetts 01950 (978)465-9512 Fax (978) 462-9043

Report on Internal Control Required By SEC Rule 17a-5 for a Broker-Dealer claiming an exemption From SEC Rule 15c3-3

Board of Directors PTP Securities, LLC Simsbury, Connecticut

In planning and performing my audit of the financial statements of PTP Securities, LLC for the year ended December 31, 2012; I considered its internal control, including control activities for safeguarding securities, in order to determine my auditing procedures for the purpose of expressing my opinion on the financial statements and not to provide assurance on the internal control.

Also, as required by Rule 17a-5(g)(1) of the Securities and Exchange Commission ("SEC"), I have made a study of the practices and procedures followed by the Company including tests of such practices and procedures that I considered relevant to the objectives stated in Rule 17a-5(g) in making the periodic computations of aggregate indebtedness (or aggregate debts) and net capital under Rule 17a-3(a)(11) and for determining compliance with the exemptive provisions of Rule 15c3-3. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, I did not review the practices and procedures followed by the Company in any of the following:

- 1. Making quarterly securities examinations, counts, verifications, and comparisons and recordation of differences required by Rule 17a-13
- 2. Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System.

The management of the Company is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls and of the practices and procedures referred to in the preceding paragraph and to assess whether those practices and procedures can be expected to achieve the SEC's above-mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable, but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit preparation of financial statements in conformity with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in any internal control or the practices and procedures referred to above, errors or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

A control deficiency exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected by the entity's internal control.

A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the entity's internal control.

My consideration of internal control was for the limited purpose described in the first and second paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. I did not identify any deficiencies in internal control and control activities for safeguarding securities that I consider to be material weaknesses, as defined above.

I understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on my study, I believe that the Company's practices and procedures were adequate at December 31, 2012 to meet the SEC's objectives.

This report is intended solely for the information and use of the Board of Directors, Management, the SEC, (Designated self-regulatory organization), and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

Harvey E Karll CPA, P.C.

Dry Extall (A) P.C.

Newburyport, MA February 18, 2013

PTP Securities, LLC

Audited Financial Statements

For the Year Ended December 31, 2012

* * * TABLE OF CONTENTS * * *

		Page
Independent Auditors Rep	port	1-2
Statement of Financial Co	ndition	3
Statement of Inocme		4
Statement of Changes in S	tockholder's Equity	5
Statements of Cash Flows		6
Notes to Financial Stateme	ents	7-10
SUPPLEMENTARY INFO	ORMATION:	
-	on of Net Capital Pursuant to	11
Sec Rule Schedule II: Exemptive	Provision under Rule 15c3-3	12
Schedule III: Supplement	ntal SIPC Report	13-15



Harvey E. Karll CPA, PC.

41 Middle Street Newburyport, Massachusetts 01950 (978)465-9512 Fax (978) 462-9043

Board of Directors PTP Securities, LLC Simbury, CT

I have audited the accompanying statement of financial condition of PTP Securities, LLC, as of December 31, 2012, and the related statements of income, changes in stockholders' equity and cash flows for the year then ended, that are filed pursuant to Rule 17a-5 under the Securities Exchange Act of 1934 and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

My responsibility is to express an opinion on these financial statements based on my audit. I conducted my audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that I plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the company's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the company's internal control. Accordingly, I express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my audit opinion.

Opinion

In my opinion, the financial statements referred to above present fairly, in all material respects, the financial position of PTP Securities, LLC, as of December 31, 2012, and the results of their operations and their cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Report on Other Legal and Regulatory Requirements

My audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in Schedules I, II, and III are presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by Rule 17a-5 under the Securities Exchange Act of 1934. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information in Schedules I, II, and III has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In my opinion, the information Schedules I, II, and III is fairly stated in all material respects in relation to the financial statements taken as a whole.

Harvey E. Karll, CPA, PC

Newburyport, MA

Date: February 18, 2013

PTP Securities, LLC Statement of Financial Condition December 31, 2012

Assets

Cash and cash equivalents	\$ 846,641
Due from affiliate	4,178
Accounts Receivable	531,845
Security deposits	4,050
Furniture and computer equipment at cost,	,
less accumulated depreciation of \$15,271	11,970
	\$ 1,398,684
Liabilities and Stockholder's Equity	
Liabilies:	
Accounts payable and accrued expenses	\$ 6,764
Members' Equity:	
Members' capital	 1,391,920
	\$ 1,398,684

PTP Securities, LLC Statements of Income For The Year Ended December 31, 2012

Revenues	
Fee income	\$ 5,490,814
Reimbursed expenses	4,672
Interest income	660
	5,496,146
Expenses:	
Employee compensation and benefits	1,872,095
Communications and data processing	41,105
Regulatory fees and expenses	63,917
Occupancy	75,005
Other expenses	355,043
	2,407,165
Net Income	\$ 3,088,981

PTP Securities, LLC Statements of Change in Members' Capital For The Year Ended December 31, 2012

Balance at beginning of period	\$ 2,970,605
Net income	3,088,981
Members distributions	 (4,667,666)
Balance at end of year	\$ 1,391,920

PTP Securities, LLC Statements of Cash Flows For The Twelve Months Ended December 31, 2012

		Y	ear to Date
Cash Provided from Operations			
Net Income	\$ 3,088,981		
Adjustments	, ,		
Add:			
Depreciation	5,775		
Accounts Receivable	1,597,725		
Less:			
Accrued expenses	(9,766)		
Cash from Operations			4,682,715
Cash Flows - Invested			
Investing Cash Flows			-
Cash Flows - Financing			
Member distribution	(4,667,666)		
Financing Cash Flows			(4,667,666)
Cash Increase (Decrease)			15,049
Cash - Beginning of Year	831,592		
Total beginning of year			831,592
Cash on Statement Date		\$	846,641

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Nature of Business

PTP Securities, LLC, the Company, is a Delaware Limited Liability Company headquartered in Simsbury, Connecticut. The Company specializes in private placements to institutional investors in the United States and Canada.

Depreciation

The company capitalizes major capital expenditures. Depreciation is based on accelerated and straight line method over the following useful lives:

Office Furniture & Equipment 5-7 years

2012 Depreciation expense was \$5,775.

Income Taxes

A limited liability company is treated as a partnership for both federal and state income tax purposes. The Company files a consolidated tax return on a cash basis with Pinnacle Trust Partners, LLC, its sole member. Therefore, no provision or liability for federal or state income taxes are required in these financial statements.

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amount of assets and liabilities as of the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

Basis of Accounting

The Company uses the accrual method of accounting for financial purposes and cash basis for income tax purposes.

Concentration of Credit Risk

The Company maintains its cash in bank deposit accounts which, at times, may exceed federally insured limits. Accounts are guaranteed by the Federal Deposit Insurance Corporation (FDIC) up to \$250,000. At December 31, 2012, the company had \$462,660 in excess of FDIC insured limits. The company has not experienced any losses in such accounts.

2. NET CAPITAL

As a broker/dealer, the company is subject to the Securities and Exchange Commission's regulations and operating guidelines, which require the Company to maintain a specified amount of net capital, as defined, and a ratio of aggregate indebtedness to net capital, as derived, not exceeding 15 to 1. The Company's net capital computed under 15c3-1 was \$839,877 at December 31, 2012, which exceeds required net capital of \$5,000 by \$834,877. The ratio of aggregate indebtedness to net capital at December 31, 2012 was 0.01 to 1.0.

3. COMPENSATED ABSENCES

Employees of the Company are entitled to paid vacation and paid sick days depending on length of service. It is not practical for the Company to estimate the amount of compensation for future absences; accordingly, no liability for compensated absences has been recorded in the accompanying financial statements. The Company policy is to recognize the costs of compensated absences when actually paid to employees.

4. CASH AND CASH EQUIVALENTS

Cash and cash equivalents include all cash balances and highly liquid investments with an initial maturity of three months or less.

5. ACCOUNTS RECEIVABLE

Accounts receivable is recorded at the amount the company expects to collect on balances outstanding at yearend. The members closely monitor outstanding balances and write off, as of year-end, all balances over a year old that have not been collected by the time the financial statements are issued.

6. LEASES

The Company is obligated on leases for office space and automobile.

Future minimum lease payments are:

Year Ending	Amount
12-31-13	\$ 60,300
12-31-14	60,300
12-31-15	25,920
	\$146,520

6. LEASES (continued)

The Company leases, under a tenancy-at-will lease agreement, premises and equipment. The rent paid under this lease in 2012 was \$2,885 monthly, \$34,620 annually.

The current lease obligation is \$5,045 per month for occupancy rent and \$2,865 per month for the automobiles.

7. PENSION AND PROFIT SHARING PLANS

The Company sponsors a defined contribution profit sharing plan that covers substantially all of its employees. Contributions are made at the discretion of the Board of Directors of the Company and are not to exceed 3% of the total compensation paid to eligible participants. Contributions made to the plan for the year ended December 31, 2012 totaled \$15,728.

8. CONCENTRATIONS IN SALES TO FEW CUSTOMERS

In 2012, five clients accounted for 100% of total revenues. Two clients accounted for 74% of total revenues.

9. CASH FLOWS

Cash paid for interest is as follows:

Interest \$ 0

10. FAIR VALUE OF FINANCIAL STATEMENTS

The company's financial statements are cash and cash equivalents and accounts receivable. The recorded values of cash and cash equivalents and accounts receivable approximate their fair values based on their short-term nature.

11. REVENUE RECOGNITION POLICY

The Company recognizes revenue on the trade date when an investor is accepted into a private placement. Success fees are paid generally quarterly over a period of years, which varies from one year to three years according to the contract with the client.

Retainer fees which are refundable are applied against future earned success fees. Non-refundable retainer fees are recognized as revenue when received.

12. RELATED PARTY TRANSACTIONS

Pinnacle Trust Partners, LLC is the sole beneficiary on three term life insurance policies on the three largest income producing employees. The face value of each policy is \$500,000. There is a receivable on the books for premiums totaling \$4,178.

PTP Securities, LLC files a consolidated tax return with Pinnacle Trust Partners, LLC, its owner, on the cash basis.

13. SUBSEQUENT EVENTS

Management has evaluated subsequent events through February 18, 2013, the date on which the financial statements were available to be issued.

14. INCOME TAXES

The Company continues to be subject to federal or state tax examinations by taxing authorities for year 2009, 2010, and 2011.

SUPPLEMENTARY INFORMATION

PTP Securities, LLC Schedule I Computation of Net Capital December 31, 2012

Net worth	\$ 1,391,920
Less: Nonallowable assets	(552,043)
Net capital (ANC)	839,877
Less: Capital requirement	(5,000)
Excess capital	\$ 834,877
Aggregate indebtedness	\$ 6,764
Ratio of aggregate indebtedness to net capital	0.01 to 1.0

There was no material difference between the audited net capital computation and the Company's corresponding unaudited net capital on the December 31, 2012 Focus report.

Schedule III FINANCIAL AND OPERATIONAL COMBINED UNIFORM SINGLE REPORT PART IIA

BROKER OR DEALER PTP Securities, LLC as of 12/31/12

EXEMPTIVE PROVISION UNDER RULE 15c3-3

If an exemption from Rule 15c3-3 is claimed, identify below the section upon which such exemption is based:

Α.	(k) (1)—Limited	business	(mutual fur	nds and/or v	ariable annuities onl	y) 4550
	(k) (2)(i)—"Spe .ntained	cial Acco	unt for the	Exclusive Be	enefit of customers"	
						X_4560
					through another broke of clearing firm(s)	
Cle	aring Firm	SEC#s	Name		Product Code	
8-	3				[4335B]	
_	[4335A]			[4335A2]		
8					[4335D]	
	[4335C]			[4335C2]		
8					[4335F]	
	[4335E]			[4335E2]		
8					[4335H]	

[4335G2]

[433512]

D. (k) (3) Exempted by order of the Commission

4580

[43351]

PTP Securities, LLC
Supplemental SIPC Report
December 31, 2012



Harvey E. Karll CPA, PC.

41 Middle Street Newburyport, Massachusetts 01950 (978)465-9512 Fax (978) 462-9043

Board of Directors PTP Securities, LLC

In accordance with Rule 17a-5(e)(4) of the Securities and Exchange Commission, we have performed the following procedures with respect to the accompanying schedule (Form SIPC-7) of Securities Investor Protection Corporation assessments and payments of PTP Securities, LLC for the year ended December 31, 2012. Our procedures were performed solely to assist you in complying with Rule 17a-5(e)(4) and our report is not to be used for any other purpose. The procedures we performed are as follows:

- 1. Compared listed assessment payments with respective cash disbursement records entries;
- 2. Compared amounts included with the amounts reported on the audited Form X-17A-5 for the period January 1, 2012 to December 31, 2012 with the amounts reported in the General Assessment Reconciliation (Form SIPC-7);
- 3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers;
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers supporting adjustments; and
- 5. Compared the amount of any overpayment applied with the Form SIPC-7 on which it was computed.

Because the above procedures do not constitute an audit made in accordance with generally accepted auditing standards, we do not express an opinion on the schedule referred to above. In connection with the procedures referred to above, nothing came to our attention that caused us to believe that the amounts shown on Form SIPC-7 were not determined in accordance with applicable instructions and forms. This report relates only to the schedule referred to above and does not extend to any financial statements of PTP Securities, LLC taken as a whole.

February 18, 2013

SECURITIES INVESTOR PROTECTION CORPORATION (33 REV 7/10)

805 15th St. N.W. Suite 800, Washington, D.C. 20005-2215 202-371 - 8300

General Assessment Reconciliation

(Read carefully the instructions in your Working Copy before completing this Form)

TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS

 Name of Member, address, Designated Examining which fiscal year ends for purposes of the a 	g Authority, 1934 Act registration no. and month in udit requirement of SEC Rule 17a-5:
8-67059 FINRA DEC 2012	Note: If any of the information shown on the mailing label requires correction, please e-mail
PTP SECURITIES, LLC	any corrections to <pre>form@sipc.org</pre> and so indicate
540 HOPMEADOW STREET, SUITE 5	On the form filed.
	Name and telephone number of person to contact
SIMSBURY, CT 06070	respecting this form. Steve Sussman 603-434-3594
2.A. General Assessment [item 2e from page 2	\$13,727
B. Less payment made with SIPC-6 filed (exclude Date Paid Amount	de interest) (
7-25-12 \$ 10,483	
<u> </u>	
	()
C. Less prior year overpayment applied	()
D. Assessment balance due or (overpayment)	3,244
E. Interest computed on late payment (see inst for days at 20% per annum	truction E)
F. Total assessment balance and interest due	(or overpayment carried forward) \$ 3,244
G. PAID WITH THIS FORM: Check enclosed, payable to SIPC	
Total (must be same as F above)	\$3,244
H. Overpayment carried forward	\$ ()
3. Subsidiaries (S) and predecessors (P) include number):	ed in this form (give name and 1934 Act registration
The SIPC member submitting this form and The person by whom it is executed represent Thereby that all information contained herein Is true, correct and complete.	(Name of Corporation Partnership of other organization)
Dated the 18th day of February , 20 13 .	(A)thorized Signature)
	(Title) days after the end of the fiscal year. Retain the ess than 6 years, the latest 2 years in an easily
Dates:	
Postmarked Received Reviewed Calculations Documentation Exceptions:	Forward Copy

DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Item No.

2e. General Assessment @ .0025

Amounts for the fiscal period beginning January 1, 2012 and ending December 31, 20 12

Eliminate cents

\$ 13,727 (to page 1, line 2.A.)

2a.	То	tal revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)	\$	5,495,486
2b.		<pre>ditions:) Total revenues from the securities business of subsidiaries(except foreign subsidiaries) and predecessors not included above.</pre>		
	(2) Net loss from principal transactions in securities in trading accounts.		
	(3) Net loss from principal transactions in commodities in trading accounts.		
	(4) Interest and dividend expense deducted in determining item 2a,		
	(5	Net loss from management of or participation in the underwriting or distribution of securities.		
	(6)	Expenses other than advertising, printing, registration fees and legal fees deducted in determining net profit from management of or participatio in underwriting or distribution of securities.	on	
	(7)	Net loss from securities in investment accounts.		
		Total additions		
2c.		Revenues from the distribution of shares of a registered open end investment company or unit investment trust, from the sale of variable annuities, from the business of insurance, from investment advisory services rendered to registered investment companies or insurance company separate accounts, and from transactions in security futures products.		5,495,486
	(2)	Revenues from commodity transactions.		
	(3)	Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions.		
	(4)	Reimbursements for postage in connection with proxy solicitation.		
	(5)	Net gain from securities in investment accounts.		
		100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from issuance date. Direct expenses of printing advertising and legal fees incurred in connection with other revenue related to the securities business (revenue defined by Section 16(9)(L) of the Act).		
	(8)	Other revenue not related either directly or indirectly to the securities business. (See Instruction C):		
		Private Placements, Dollar for Dollar Reimbursed Expense Income		4,672
	(9)	(i) Total interest and dividend expense (FOCUS Line 22/PART IIA Line 13, Code 4075 plus line 2b(4) above) but not in excess of total interest \$ and dividend income.		
		(ii) 40% of interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).		
		Enter the greater of line (i) or (ii)		
		Total deductions	_	4,672
2d.	SIP	C Net Operating Revenues	Ś	5.490.814